

DATE: December 6, 1984  
TO: Division File  
FROM: R. L. Munger *RL Munger*  
SUBJECT: 2010300031 - Winnebago County  
Rockford/Rockford Products #3  
ILD005212097



I visited the facility on November 27, 1984, to do a routine RCRA inspection. According to the USEPA printout dated 8-3-84 this facility is a generator, transportor and TSD.

The following hazardous wastes are generated at this facility:

1, 1, 1 trichlorethane	280 gallon containers	F001
wastewater treatment sludge from plating operations	roll-off box	F006
Cyanide cadmium stripper	55-gallon drums	F009
Cyandie copper stripper	55-gallon drums	F009

At the time of the inspection there were no spent stripping solutions on-site.

The roll-off box is also used to store plating sludge generated at plant #2. Plant #2 is located on the northwest corner of Harrison Avenue and Kishwaukee Street. Plant #3 is located on the southeast corner. Vehicles carrying waste from Plant #2 to Plant #3 travel along rather than across a public right-of-way. Therefore, this transportation does not occur only "on-site" as defined by 35 Ill. Adm. Code 720.110. Rockford Products claims that they are not required to use a manifest for shipping this waste, because they are shipping it on-site and claim that the Illinois Pollution Control Board's action on Eureka vs. EPA, PCB 79-117 applies to their situation. I discussed the situation with Heidi Hanson of the Enforcement Division. She told me that because Rockford Products transports the hazardous waste along, rather than across, the public right-of-way, they must comply with the requirements for hazardous waste haulers, including manifesting each shipment.

Cyanide stripping solutions are listed due to toxicity and reactivity. During the inspection Mr. Hammond and Mr. Reid told me that Rockford Products does not store any reactive wastes. I will ask for clarification of this matter in the compliance inquiry letter.

RECEIVED

DEC 10 1984

IEPA-DLPC

Division File  
Rockford Products #3  
December 6, 1984  
Page 2

The following violations were found during the inspection:

1. The waste analysis plan does not include procedures for inspection and analysis of waste received from off-site (plant #2) (35 Ill. Adm. Code 725.113).
2. The operating record does not include the method(s) and date(s) of each wastes treatment or storage as required by Appendix I to 40CFR265 and the location and quantity of each hazardous waste within the facility (35 Ill. Adm. Code 725.173).
3. Hazardous waste (wastewater treatment sludge) had been spilled on the ground by the outside roll-off box (35 Ill. Adm. Code 725.273).
4. This facility does not comply with the manifest requirements for waste received from Plant #2 (35 Ill. Adm. Code 725.170, 725.171, 725.172).

An evaluation of compliance with the incinerator standards was not done because the incinerator is not in use. The incinerator was taken out of service because it violated Illinois particulate standards.

mr  
cc: Rockford Region  
H. Hanson

RECEIVED  
DEC 10 1984  
IEPA-DLPC